

Monte J. White and Associates, P.C.  
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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION

IN RE:  
Nicholas Harrison Seitz, Jr. § CHAPTER 13  
AND § CASE NO. 09-70535-HdH-13  
Ganel Beadle Seitz § HEARING DATE: 10/20/2010  
DEBTOR(S) § HEARING TIME: 11:00 AM

MOTION TO MODIFY TERM OF CHAPTER 13 PLAN AFTER CONFIRMATION

1. The Debtor(s), by their attorney, state and represent as follows:
2. That since confirmation of the Chapter 13 plan on 2/18/2010, the Debtor(s) have completed all payments required under the confirmed plan.
3. That under §1328(a) of the Bankruptcy Code, "the court **shall** grant the debtor a discharge" if the Debtor has completed all payments under the plan.
4. That Debtor(s) confirmed plan required plan payments of \$537.00 for 60 months for a total plan base of \$31,112.00.
5. That on 8/24/2010, Trustee received and accepted the final payment required toward the plan base.
6. That Debtor(s) made the lump sum payment to the Trustee with funds received from proceeds of the sale of their homestead.
7. That Debtor(s) have paid off the Chapter 13 plan in good faith.
8. That Debtor(s) seek a modification under §1329(a) to decrease the plan term from 60 to 10 months.

WHEREFORE, the Debtor(s) move this honorable court to enter an order modifying the term of Debtor(s) confirmed Chapter 13 plan to 10 months, thereby allowing the Debtor(s) to receive a Chapter 13 Discharge Pursuant to 11 U.S.C. §1328(a), and to other and further relief to which they may be entitled.

Respectfully submitted,

/s/Monte J. White  
Attorney for Debtor(s)

CERTIFICATE OF SERVICE

A true and exact copy of the foregoing Motion and Notice of Hearing was served electronically by the ECF System or by First Class Mail on August 31, 2010, on all parties on the mailing matrix:

/s/Monte J. White  
Attorney for Debtor(s)

Case 09-70535-hdh13 Doc 59 Filed 08/31/10 Entered 08/31/10 15:22:24 Desc Main  
 Label Matrix for local noticing 1100 Commerce Street Bank One-Chase  
 0539-7 Room 1254 8333 Ridgepoint Dr  
 Case 09-70535-hdh13 Dallas, TX 75242-1305 Irving, TX 75063-5812  
 Northern District of Texas  
 Wichita Falls  
 Fri Aug 27 14:50:35 CDT 2010

Capital 1 Bank Attn: CO TSYS Debt Management PO Box 5155 Norcross, GA 30091-5155	Chase 800 Brookside Blvd Westerville, OH 43081-2822	Chase Po Box 15298 Wilmington, DE 19850-5298
Chase Bank USA, NA PO Box 15145 Wilmington, DE 19850-5145	Citibank Attn: Centralized Bankruptcy PO Box 20507 Kansas City, MO 64195-0507	City of WF, WFISD, Wichita County CO Perdue Brandon Fielder Collins & Mott P.O. Box 8188 Wichita Falls, Texas 76307-8188
DISCOVER BANK DFS Services LLC PO Box 3025 New Albany, Ohio 43054-3025	Discover Fin Svcs Llc Po Box15316 Wilmington, DE 19850-5316	Eddie Halter Properties 4001 Call Field Rd Wichita Falls, TX 76308-2633
First Bank 2801 Midwestern Parkway Suite 200 Wichita Falls, TX 76308-2850	First Bank 4110 Kell Blvd Wichita Falls, TX 76309-4955	IRS Special Procedures 1100 Commerce St., Room 951 Mail Stop 5029 DAL Dallas, TX 75242-1001
LVNV Funding LLC its successors and assigns assignee of Chase Bank USA, N.A. Resurgent Capital Services PO Box 10587 Greenville, SC 29603-0587	Liberty National Bank 629 Sw C Ave Lawton, OK 73501-4302	Monte J. White & Associates 1106 Brook Ave Wichita Falls TX 76301-5009
PRA Receivables Management, LLC As Agent Of Portfolio Recovery Assocs. CO Chase Bank USA, N.A. POB 41067 NORFOLK, VA 23541-1067	PRA Receivables Management, LLC As Agent Of Portfolio Recovery Assocs. CO Citibank POB 41067 NORFOLK VA 23541-1067	Recovery Management Systems Corporation 25 SE 2nd Ave. Ste. 1120 Miami, FL 33131-1605
Recovery Management Systems Corporation 25 S.E. 2nd Avenue, Suite 1120 Miami, FL 33131-1605	WICHITA FALLS CITY, ISD & WICHITA COUNTY CO PERDUE BRANDON FIELDER COLLINS & MOT PO BOX 8188 WICHITA FALLS TX 76307-8188	Ganel Beadle Seitz 1542 Norman Wichita Falls, TX 76302-2926
Monte J. White Monte J. White & Associates, P.C. 1106 Brook Avenue Hamilton Place Wichita Falls, TX 76301-5009	Nicholas Harrison Seitz Jr. 3204 Martin Blvd Wichita Falls, TX 76308-2016	UST U.S. Trustee 1100 Commerce Street Room 976 Dallas, TX 75242-1011
Walter 12,13 OCheskey 6308 Iola Avenue Lubbock, TX 79424-2735		

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Chase Bank USA, NA  
PO Box 15145  
Wilmington, DE 19850-5145

(u)Liberty National Bank

End of Label Matrix	
Mailable recipients	27
Bypassed recipients	2
Total	29